

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES ROBINSON,

Plaintiff,

v.

TELESECTOR RESOURCES GROUP, INC. D/B/A)
VERIZON SERVICES GROUP,)

Defendant.)

Civil Action No. 04-11964-NG

ASSENTED TO MOTION TO ADMIT FELIX J. SPRINGER
PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), Defendant Telesector Resources Group, Inc., d/b/a Verizon Services Group (“Verizon”) by and through its counsel, respectfully moves this Court to admit Felix J. Springer, Esquire, pro hac vice as counsel for Verizon in the above-captioned matter. The grounds for this motion are as follows:

1. Mr. Springer is a member in good standing of every bar in which he has been admitted to practice. (See Affidavit of Felix J. Springer (“Springer Aff.”), at ¶ 2).

2. Mr. Springer has been admitted to practice before the Courts of the State of Connecticut, the United States District Court for the District of Connecticut, United States District Court for the Southern District of New York, and the United States Court of Appeals for the Second, Fifth and Tenth Circuits. (Springer Aff. at ¶ 2.)

3. There are no disciplinary proceedings pending against Mr. Springer as a member of the bar of any jurisdiction. (Springer Aff. at ¶ 3).

4. Mr. Springer is familiar with the local rules of this Court and the Federal Rules of Civil Procedure. (Springer Aff. at ¶ 4).

5. Mr. Springer is familiar with Verizon and the issues in this lawsuit. Mr. Springer's appearance and participation in this matter in conjunction with attorneys from Day, Berry & Howard LLP's Boston office are necessary for the proper and effective representation of Verizon. (Springer Aff. at ¶ 5).

6. This motion is made by a member of the bar of this Court who has made an appearance in this matter.

7. Plaintiff's counsel, Frank L. Fragomeni, Jr. has been contacted and has assented to this Motion.

WHEREFORE, Verizon, by and through its counsel, moves this Court to admit Felix J. Springer pro hac vice in this litigation.

Respectfully submitted,

Defendant,
TELESECTOR RESOURCES GROUP, INC.
D/B/A VERIZON SERVICES GROUP,
By its attorneys,

February 9, 2005

/s/ John P. McLafferty
John P. McLafferty, BBO #639179
DAY, BERRY & HOWARD LLP
260 Franklin Street
Boston, Massachusetts 02110
(617) 345-4600

CERTIFICATE OF SERVICE

I, John P. McLafferty, do hereby certify that on this 9th day of February, 2005 I caused a true copy of the foregoing to be delivered by first-class mail, postage prepaid, to Frank L. Fragomeni, Jr., Esquire, 15 Broad Street, Suite 501, Boston, Massachusetts 02109.

/s/ John P. McLafferty
John P. McLafferty